Please use this form to document your comments to the above document. Please number your comments in the first column and indicate the page, section, and line number (if provided) that reference the comment's location in the review document.

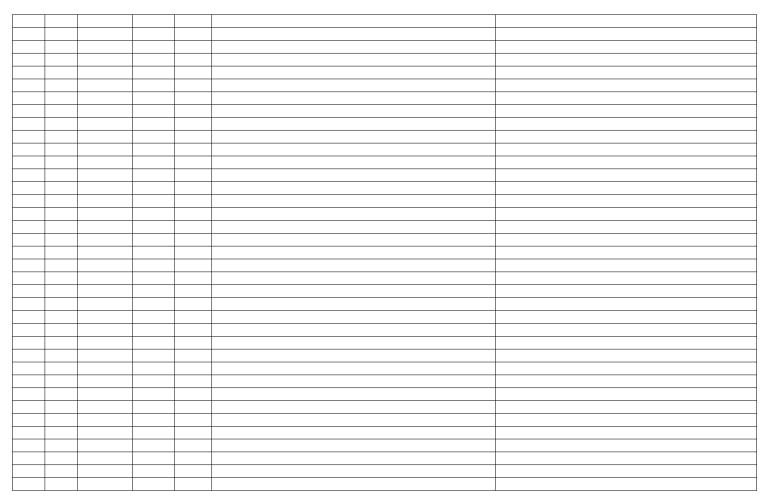
To be of the greatest value to the document development process, please make your comments as specific as possible (e.g., rather than stating that more current information is available regarding a topic, provide the additional information [or indicate where it may be acquired]; rather than indicating that you disagree with a statement, indicate why you disagree with the statement and recommend alternative text for the statement). Do not enter information in the Resolution column. Return completed document form to xxxxx by COB MM/DD/YYYY.

| omm | nent: Effects Analysi nents Submitted By: | | Date Comments Requested by: Date Comments Submitted: | |
|-----|--|--|--|--|
| | SECTION # PAGE # | | Affiliation: State Water Board COMMENT | RESOLUTION |
| | a-5 to a- 7 | ecolotwo 1) ou Cha effec (iten distr whic both prpe Fish the | utflow as it is related to salinity gradients (in item 8 inges in water quality have important direct and indirect cts throughout the estuarine ecosystem); and 2) land use in 9 9: Land use is a key determinant of the spatial | regimes characteristic of California's natural climate and hydrology. This includes higher flows in the winter and spring and lower flows in the summer and early fall. Altered Delta flow regimes are detrimental to native aquatic species and encourage nonnative aquatic species"; |

| a-5 to a- 7 | See also pages 6 and 7 from Conservation Strategy for Restoration of the Sacramento-San Joaquin Delta Ecological Management Zone and the Sacramento and San Joaquin Valley Regions, July Draft: "Inflow from the San Joaquin and Sacramento Rivers and outflow from the Delta should reflect the natural flow patterns (hydrograph) and be sufficient to cue and facilitate upstream and downstream migrations of fishes through the Delta and stimulate other biotic and abiotic processes. Flows should also support local movements of fishes and provide access to and movement among currently functioning and restored aquatic habitats. Restored flows and habitats aim to improve physical conditions and food production for imperiled fish species, and along with reductions in major stressors, should support thriving populations of fish and other species in the Delta." |
|----------------|--|
| a-5 to a- | |
| 7 | See also page 5 of Strate Water Board's Delta Flow Report: "Recent Delta flows are insufficient to support native Delta fishes for today's habitats. Flow modification is one of the immediate actions available although the links between flows and fish response are often indirect and are not fully resolved. Flow and physical habitat interact in many ways, but they are not interchangeable." |
| a-5 to a- 7 | See also package of material prepared by Delta Science Program for January 26, 2011 Delta Stewardship Council meeting |

| a-5 to a- 7, a-45 | item 8:"Changes in water quality have important direct and indirect effects throughout the estuarine ecosystem." This item | Suggest modifying words in item 8 on page a-6 to more broadly describe water quality; and follow through with expanded discussion throughout document, including how BDCP changes could affect water quality. |
|---|---|---|
| a-8 | One of the bullet point identified to achieve ecological health of the delta is: "Actions that directly address key ecosystem drivers rather than manipulation of Delta flow patterns alone." Use of "rather than" appears conclusory, suggesting that flow is not important. Such a conclusion is premature for a framework that is meant to provide foundation for an effects analysis. | A more flat way of presenting this point would be to say: "Actions that address key ecosystem drivers in conjunction with manipulation of Delta flow patterns". Suggest the document follow through and provide information consistent with this more flat statement. |
| multiple locations including page A-45 | Glibert's (2010) paper concerning long-term changes in nutrient loading and stoichiometry and their relationships with changes in the food web and dominant pelagic fish species in the San Francisco Estuary, California is referenced at multiple points within the document (e.g., page A-45). The conclusions in this paper have been challenged by Cloern et al. (2011), who demonstrate that the statistical methods used to derive the food web relationships are inappropriate and generate false correlations. | The 5th Draft of the Delta Plan (page 142) provides an example for how areas of active research and scientific debate, such as this, can be put in context and more fully described. |
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Document: Effects Analysis Appendix A. Conceptual Foundation and Analytical Framework

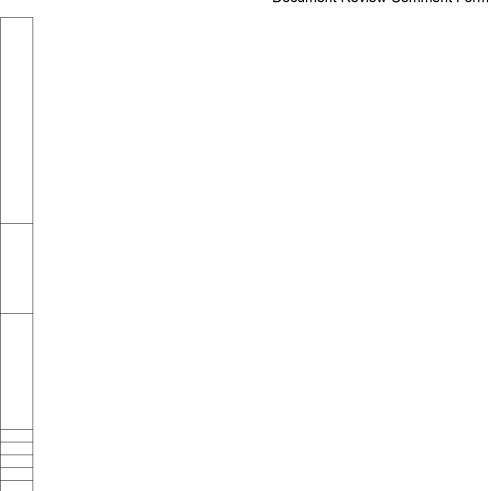
Comments Submitted By: L Grober Affiliation: State Water Board

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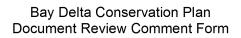
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